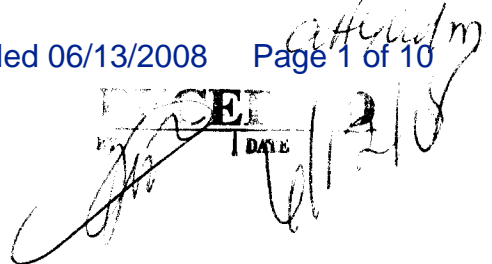


*affidavit*  
  
 FILED  
 DATE 6/12/08

UNITED STATES DISTRICT COURT  
 SOUTHERN DISTRICT OF NEW YORK

E.T.I. Euro Telecom Internacional, N.V. )  
 )  
 )  
 Plaintiff, )  
 )  
 v. )  
 )  
 Republic of Bolivia and )  
 Empresa Nacional de Telecomunicaciones )  
 Entel S.A., )  
 )  
 Defendants. )

Case No. 08-cv-4247 (LTS)

**SCANNED**

**MOTION TO ADMIT COUNSEL  
 PRO HAC VICE**


PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Ronald E.M. Goodman, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of

PAUL S. REICHLER  
 Foley Hoag, LLP  
 1875 K Street, N.W.  
 Washington, D.C. 20006  
 Telephone: (202) 223-1200  
 Facsimile: (202) 785-6687  
 Email: preichler@foleyhoag.com

JANIS H. BRENNAN  
 Foley Hoag, LLP  
 1875 K Street, N.W.  
 Washington, D.C. 20006  
 Telephone: (202) 223-1200  
 Facsimile: (202) 785-6687  
 Email: jhbrennan@foleyhoag.com

GERALDINE R. FISCHER  
 Foley Hoag, LLP  
 1875 K Street, N.W.  
 Washington, D.C. 20006  
 Telephone: (202) 223-1200  
 Facsimile: (202) 785-6687  
 Email: gfischer@foleyhoag.com


JUN 12 2008

*975-65-3935*  


To the best of my knowledge, information and belief, Mr. Reichler and Ms. Brennan are members in good standing of the Bar of Washington, D.C., Ms. Fischer is a member in good standing of the Bar of the State of New York and the Bar of Washington, D.C., and there are no pending disciplinary proceedings against any of these attorneys in any State or Federal Court.

WHEREFORE, it is respectfully requested that the Court grant the motion to admit Paul Reichler, Janis Brennan, and Geraldine Fischer pro hac vice, to represent Defendant Republic of Bolivia in this matter.

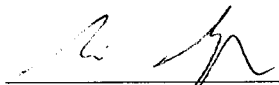
Dated: June 11, 2008  
Washington, D.C.

  
\_\_\_\_\_  
Ronald E.M. Goodman (SDNY #RG6698)  
Foley Hoag, LLP  
1875 K St, NW, Suite 800  
Washington, DC 20006  
Telephone: (202) 223-1200  
Facsimile: (202) 785-6687

*Attorney for Defendant Republic of Bolivia*

CERTIFICATE OF SERVICE

I, Nicholas Renzler, hereby certify that on June 11, 2008, I caused a true copy of the foregoing document to be served upon all parties by Federal Express.

  
\_\_\_\_\_  
Nicholas Renzler

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

E.T.I. Euro Telecom Internacional, N.V.

Plaintiff,

V.

Republic of Bolivia and  
Empresa Nacional de Telecomunicaciones  
Entel S.A.,

Defendants.

Case No. 08-cv-4247 (LTS)

**AFFIDAVIT OF RONALD E.M. GOODMAN IN SUPPORT OF MOTION TO ADMIT  
COUNSEL PRO HAC VICE**

Ronald E.M. Goodman, being duly sworn, hereby deposes and says as follows:

1. I am a partner with the firm of Foley Hoag LLP, counsel to Defendant Republic of Bolivia in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant Republic of Bolivia's motion to admit Paul S. Reichler, Janis H. Brennan and Geraldine R. Fischer counsel pro hac vice to represent Defendant Republic of Bolivia in this matter.

2. I am member in good standing of the bar of the State of New York, where I was admitted to practice law in July 1987, and of the bar of the District of Columbia, where I was admitted to practice law in April 1989.

3. I have known Paul S. Reichler since about August 2006.

4. I have known Janis H. Brennan since about August 2006.

5. I have known Geraldine R. Fischer since about February 2005.

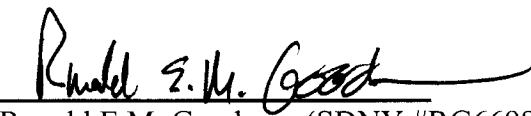
5. Mr. Reichler and Ms. Brennan are partners at Foley Hoag LLP, resident in the firm's Washington, D.C. office. Ms. Fischer is an associate at Foley Hoag LLP.

7. I have found Mr. Reichler, Ms. Brennan and Ms. Fischer to be skilled attorneys and persons of integrity. To the best of my knowledge and information, they are experienced in federal practice and are familiar with the Federal Rules of Civil Procedure.

8. Accordingly, I am pleased to move for the admission of Paul S. Reichler, Janis H. Brennan and Geraldine R. Fischer, pro hac vice.

9. I respectfully submit a proposed order granting the admission of Paul S. Reichler, Janis H. Brennan and Gerladine R. Fischer pro hac vice, which is attached hereto.

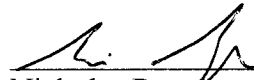
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Washington, D.C.

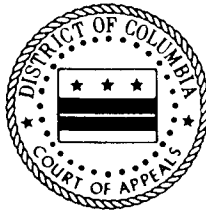
  
Ronald E.M. Goodman (SDNY #RG6698)  
Foley Hoag, LLP  
1875 K St, NW, Suite 800  
Washington, DC 20006  
Telephone: (202) 223-1200  
Facsimile: (202) 785-6687

*Attorney for Defendant Republic of Bolivia*

CERTIFICATE OF SERVICE

I, Nicholas Renzler, hereby certify that on June 11, 2008, I caused a true copy of the foregoing document to be served upon all parties by Federal Express.

  
Nicholas Renzler



District of Columbia Court of Appeals  
Committee on Admissions  
500 Indiana Avenue, N.W. — Room 4200  
Washington, D. C. 20001  
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

PAUL S. REICHLER


---

was on the 7<sup>TH</sup> day of DECEMBER, 1973

duly qualified and admitted as an attorney and counselor and entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on May 20, 2008.

GARLAND PINKSTON, JR., CLERK

By:   
Deputy Clerk



*State of New York*  
*Supreme Court, Appellate Division*  
*Third Judicial Department*

---

*I, Michael J. Novack, Clerk of the Appellate Division of the Supreme Court of the State of New York, Third Judicial Department, do hereby certify that*

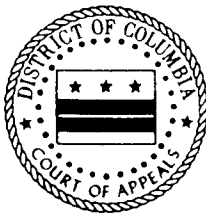
*Geraldine Rebeca Fischer*

*having taken and subscribed the Constitutional Oath of Office as prescribed by law, was duly licensed and admitted to practice by this Court as an Attorney and Counselor at Law in all courts of the State of New York on the 29th day of January, 2003, is currently in good standing and is registered with the Administrative Office of the Courts as required by section four hundred sixty-eight-a of the Judiciary Law.*

*In Witness Whereof, I have hereunto set my hand and affixed the Seal of said Court, at the City of Albany, this 22nd day of May, 2008.*



*Michael J. Novack*  
\_\_\_\_\_  
*Clerk*



District of Columbia Court of Appeals  
Committee on Admissions  
500 Indiana Avenue, N.W. — Room 4200  
Washington, D. C. 20001  
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

JANIS H. BRENNAN

---

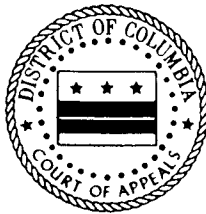
was on the 4<sup>TH</sup> day of DECEMBER, 1987

duly qualified and admitted as an attorney and counselor and entitled to practice before this Court and is, on the date indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have hereunto subscribed my name and affixed the seal of this Court at the City of Washington, D.C., on May 20, 2008.

GARLAND PINKSTON, JR., CLERK

By: *Rickey Corbin*  
Deputy Clerk



District of Columbia Court of Appeals  
Committee on Admissions  
500 Indiana Avenue, N.W. — Room 4200  
Washington, D. C. 20001  
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia Court of Appeals, do hereby certify that

GERALDINE FISCHER

---

was on the 4<sup>TH</sup> day of NOVEMBER, 2005  
duly qualified and admitted as an attorney and counselor and  
entitled to practice before this Court and is, on the date  
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have  
hereunto subscribed my name  
and affixed the seal of this  
Court at the City of  
Washington, D.C., on May 20,  
2008.

GARLAND PINKSTON, JR., CLERK

By: *Puckey Corbin*  
Deputy Clerk



**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

E.T.I. Euro Telecom Internacional, N.V.	)	
	)	
	)	
Plaintiff,	)	Case No. 08-cv-4247 (LTS)
	)	
v.	)	
	)	
Republic of Bolivia and	)	<b>ORDER FOR ADMISSION</b>
Empresa Nacional de Telecomunicaciones	)	<b>PRO HAC VICE</b>
Entel S.A.,	)	<b>ON WRITTEN MOTION</b>
	)	
Defendants.	)	
	)	

Upon the motion of Ronald E.M. Goodman, attorney for Defendant Republic of Bolivia in the above-caption case and said sponsor attorney's affidavit in support;

**IT IS HEREBY ORDERED** that

Applicant's Name: Paul S. Reichler  
Firm Name: Foley Hoag, LLP  
Address: 1875 K Street, N.W.  
City/State/Zip: Washington, D.C. 20006  
Telephone: (202) 223-1200  
Facsimile: (202) 785-6687  
Email: preichler@foleyhoag.com

Applicant's Name: Janis H. Brennan  
Firm Name: Foley Hoag, LLP  
Address: 1875 K Street, N.W.  
City/State/Zip: Washington, D.C. 20006  
Telephone: (202) 223-1200  
Facsimile: (202) 785-6687  
Email: jhnbrennan@foleyhoag.com

Applicant's Name: Geraldine R. Fischer  
Firm Name: Foley Hoag, LLP  
Address: 1875 K Street, N.W.  
City/State/Zip: Washington, D.C. 20006  
Telephone: (202) 223-1200  
Facsimile: (202) 785-6687  
Email: gfischer@foleyhoag.com

are admitted to practice pro hac vice as counsel for Defendant Republic of Bolivia in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. Counsel shall immediately apply for an ECF password at [nysd.uscourts.gov](http://nysd.uscourts.gov). Counsel shall forward the pro hac vice fee to the Clerk of the Court.

Dated:

City, State:

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United States District Judge